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Attorneys for Defendant,  
*EVERYTHING BREAKS, INC.*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

STEPHAN CAMPBELL, individually and on behalf  
of all others similarly situated,

Plaintiff,

vs.

EVERYTHING BREAKS, INC.,

Defendant.

CASE NO.: 2:23-cv-00861-GMN-EJY

**JOINT MOTION TO CONTINUE  
THE HEARING ON PLAINTIFF'S  
DISCOVERY MOTION [DKT. 20]**

**(First Request)**

Pursuant to Local Rule IA 6-1, Plaintiff, Stephan Campbell, individually and on behalf of all others similarly situated (hereinafter referred to as "Plaintiff"), and Defendant, Everything Breaks, Inc. (hereinafter referred to as "Defendant," and collectively with Plaintiff, as "Parties"), hereby agree and stipulate as follows:

On March 29, 2024, this Court issued a Minute Order [Dkt. 25] setting the hearing for Plaintiff's Motion to Compel Discovery [Dkt. 20] for Monday, April 15, 2024 at 2:00 p.m. Further, the Court ordered the Parties must file a status report no later than 12 noon Pacific Time on April 11, 2024.

The Parties have met and conferred on April 3 and 9, 2024 regarding the outstanding discovery issues and agreed to extend the hearing date for Plaintiff's Motion to Compel Discovery by three (3) weeks from April 15 to May 6, or the first available date on the Court's

1 calendar thereafter. In addition, the Parties have agreed to continue the status report deadline  
 2 until May 6, or three (3) court days prior to the rescheduled hearing date, whichever comes first.

3 Good cause for the extension exists due to Defendant's current counsel having recently  
 4 taken over the case, and is currently in the process of reviewing the file and collecting  
 5 information regarding the subject matter of the present Discovery Dispute. This information  
 6 gathering aims to narrow down the remaining issues in dispute and/or potentially resolve them  
 7 entirely.

8 THUS, the Parties have agreed to request a continuance of both the hearing date and the  
 9 status report deadline.

10 THEREFORE, jointly request to extend the hearing date for Plaintiff's Motion to Compel  
 11 Discovery by three (3) weeks from April 15 to May 6, or the first available date on the Court's  
 12 calendar thereafter. In addition, jointly requested to extend the status report deadline to May 2, or  
 13 three (3) court days prior to the rescheduled hearing date, whichever comes first.

14  
 15 Dated: April 10, 2024

**GORDON REES SCULLY MANSUKHANI**

16  
 17 By: s/Sean P. Flynn  
 18 Sean P. Flynn, Esq.  
 19 Tomiko A. Ortiz, Esq.  
 Attorneys for Defendant  
 EVERYTHING BREAKS, INC.

20  
 21  
 22 Dated: April 10, 2024

**CRAIG K. PERRY & ASSOCIATES**

**THE LAW OFFICE OF CHRIS R.  
 MILTENBERGER, PLLC**

**THE WEITZ FIRM, LLC**

23  
 24  
 25  
 26 By: s/Max S. Morgan  
 27 Craig K. Perry, Esq.  
 Chris R. Miltenberger, Esq.  
 Eric H. Weitz, Esq.  
 28 Max S. Morgan, Esq.

Attorneys for Plaintiff  
*STEPHAN CAMPBELL, on behalf of  
himself and all others similarly situated*

**ORDER**

IT IS HEREBY ORDERED that the Joint Motion to Continue the Hearing on Plaintiff's Discovery Motion (ECF No. 32) is GRANTED.

IT IS FURTHER ORDERED that the hearing on Plaintiff's Motion to Compel Discovery (ECF No. 20) currently set for April 15, 2024 at 2:00 p.m. is vacated and rescheduled for **May 14, 2024 at 10:00 a.m. in LV Courtroom 3D.**

IT IS FURTHER ORDERED that the parties **must** file a status report no later than **12 noon Pacific Time on May 7, 2024**, identifying any issue currently before the Court that are no longer at issue, if any.

  
U.S. Magistrate Judge

DATED: April 10, 2024

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